



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

January 21, 2004

**Certified Mail No. 7000 1670 0013 9128 7475**

Mr. Burl Ackerman  
Environmental Manager  
J.R. Simplot Company  
P.O. Box 9069  
Nampa, Idaho 83652

RE: Facility ID No. 027-00059, J.R. Simplot Co., Nampa  
Final Tier II Operating Permit and Permit to Construct Revision

Dear Mr. Ackerman:

The Department of Environmental Quality (DEQ) is issuing revised Tier II Operating Permit and Permit to Construct No. T2-030064 for the J.R. Simplot Co.'s facility, located in Nampa, in accordance with the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-461 and 58.01.01.200-228, respectively. This permit has been revised by DEQ as requested in your August 28, 2003 submittal. Specifically, the AIRS facility classification has been changed from SM to B to correctly classify the facility as a natural minor facility.

DEQ is not scheduling a meeting with the J.R. Simplot Co. to discuss the terms and requirements of the permit because this permitting action has not affected any existing terms or requirements. However, if the J.R. Simplot Co. would like to discuss the terms and requirements of this permit, please contact Tom Krinke of DEQ's Boise Regional Office at (208) 373-0550 to schedule a meeting. Should a meeting take place, DEQ recommends the following representatives attend the meeting: your plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or [wrogers@deq.state.id.us](mailto:wrogers@deq.state.id.us).

Sincerely,

*M. Bauer* for:

Martin Bauer, Administrator  
Air Quality Division

MB/HE/sd      Permit No. T2-030064  
Enclosures

J.R. Simplot Co., Nampa

January 21, 2004

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cc: Tom Krinke, Boise Regional Office  
Bill Rogers, Permit Coordinator  
Marilyn Seymore, (PF)  
Joan Lechtenberg, Public Comment  
Pat Rayne, Air Quality Division  
Sherry Davis, AQ Division/SF  
Permit Binder  
Laurie Kral, EPA Region 10  
Phyllis Heitman, (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** T2-030064

**FACILITY ID NO.:** 027-00059

**AQCR:** 64

**CLASS:** B

**SIC:** 2037

**ZONE:** 11

**UTM COORDINATE (km):** 531.7, 4828.8

**1. PERMITTEE**

J. R. Simplot – Food Group

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P. O. Box 9069

**CITY**

Nampa

**STATE**

ID

**ZIP**

83652

**4. FACILITY CONTACT**

Burl Ackerman

**TITLE**

Environmental Manager

**TELEPHONE**

208-442-4048

**5. RESPONSIBLE OFFICIAL**

Dale Baker

**TITLE**

Unit Director

**TELEPHONE**

208-466-8911

**6. EXACT PLANT LOCATION**

3704 North Middleton Road, Nampa, Idaho

**COUNTY**

Canyon

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Frozen potato processor

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470. and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

**C. STEPHEN ALLRED, DIRECTOR DIVISION  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** January 21, 2004

**DATE EXPIRES** September 4, 2007

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## ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval Subsystem
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	U.S. Environmental Protection Agency
gr	grains (1 lb = 7000 grains)
H <sub>2</sub> S	hydrogen sulfide
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
M	thousand
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter of 10 micrometers or less
PTC	permit to construct
SCFM	standard cubic feet per minute
SIC	Standard Industrial Classification Code
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

# AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-030064

<b>Permittee:</b>	J. R. Simplot - Food Group	<b>AIRS Facility No.</b> 027-00059	<b>Date Issued:</b>	January 21, 2004
<b>Location:</b>	Nampa, Idaho		<b>Date Expires:</b>	September 4, 2007

## 1. PERMIT SCOPE

### *Purpose*

- 1.1 This permitting action administratively revises the facility's AIRS classification from SM to B.
- 1.2 This permit replaces Tier II No. 027-00059, issued January 3, 1996; and incorporates PTC No. 027-00059, issued December 15, 2000 and Tier II Operating Permit and PTC No. T2-010032, issued September 4, 2002.

### *Regulated Sources*

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

**Table 1.1 REGULATED EMISSION SOURCES**

Permit Sections	Source Description	Emission Controls
3	Nebraska MS-E-66 gas-fired boiler, 99.8 MM Btu/hr, installed 2001  Cleaver Brooks NS-F-84 gas-fired boiler, 70 MM Btu/hr Nine gas-fired make up air heaters, < 10 MM Btu/hr each	Todd-Lo-NO <sub>x</sub> Variflame burner None None
4	Main Line Dryer (gas-fired), National Drying, 1987 Cam, 21 MM Btu/hr Main Line Fryer, Heat and Control, FF6029-5-I-3F Specialty Line Dryer/Cooler, Proctor Schwartz, K21761 Specialty Line Fryer, Gem Equipment, 1700	None None None None
5	Anaerobic digester and 4.95 MM Btu/hr Cleaver Brooks boiler, Model 700-350-160	Flare, Varec Model 244W

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**2. FACILITY-WIDE CONDITIONS**

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

***Odors***

- 2.2 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution as required in IDAPA 58.01.01.775-776.
- 2.3 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.

***Excess Emissions***

- 2.5 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

***Reports and Certifications***

- 2.6 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, Idaho 83706-2239

***Open Burning***

- 2.7 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

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**3. NATURAL GAS COMBUSTION EQUIPMENT****3.1 Process Description**

The primary purpose of the Nebraska and Cleaver Brooks boilers is generating process steam. The air makeup heaters provide space heat for the plant.

**3.2 Control Description**

Emissions from the natural gas combustion sources are uncontrolled.

***Emission Limits*****3.3 Particulate Matter Emissions**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

**3.4 Emissions Limits**

Emissions of PM, PM<sub>10</sub>, NO<sub>x</sub>, and CO from the natural gas combustion equipment shall not exceed any corresponding emissions rate limits listed in the following table.

[PTC Condition]

**Table 3.1 NATURAL GAS COMBUSTION EQUIPMENT EMISSIONS LIMITS**

Source Description	PM/PM <sub>10</sub>		NO <sub>x</sub>		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cleaver Brooks boiler	0.5	2.25	6.8	29.7	5.7	24.9
Nebraska boiler	0.7	3.21	4.3	18.8	8.1	35.5
Air make-up units			3.6	15.8		

***Operating Requirements*****3.5. Fuel**

The permittee shall combust natural gas exclusively in the Nebraska and Cleaver Brooks boilers.

[PTC Condition]

***Monitoring and Recordkeeping*****3.6 NSPS Fuel Consumption**

The permittee shall monitor and record the amount of natural gas burned in the Nebraska boiler on a daily basis.

[PTC Condition]



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**4. PROCESS EQUIPMENT****4.1 Process Description**

The processes covered by this section of this permit are the main line and the specialty line. The air pollutant-emitting operations are the drying and frying of potatoes.

**4.2 Control Description**

These operations are uncontrolled.

***Emission Limits*****4.3 Emission Limits**

Emissions from the process equipment shall not exceed the following emission rates:

PM/PM<sub>10</sub> – 70.9 T/yr; NO<sub>x</sub> – 8.9 T/yr; and VOC-55 T/yr.

**[PTC Condition]**

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**5. ANAEROBIC DIGESTION EQUIPMENT****5.1 Process Description**

The primary purpose of the emissions unit is to burn the offgases, which contain H<sub>2</sub>S, released from anaerobic digesters that treat wastewater from the potato processing operations. The offgases are burned in a boiler and/or a flare.

**5.2 Control Description**

Emissions from the offgas combustion are uncontrolled.

***Emission Limits*****5.3 Emission Limits**

The SO<sub>2</sub> emissions from combustion of offgases from the anaerobic digester boiler and flare shall not exceed 26.9 T/yr in any consecutive 12-month period.

[PTC Condition]

***Operating Requirements*****5.4 Pilot Flame and Alarm System on Flare**

The flare shall be operated with a pilot flame present during the operation of the compressors. The permittee shall install an alarm system on the flare to notify operating personnel in case of a flare flame-out. The flare shall be reignited as expeditiously as practicable. The permittee shall maintain records of the time and duration of all flame-out periods onsite for a period of 5 years.

[PTC Condition]

***Monitoring and Recordkeeping Requirements*****5.5 Biogas Flow and H<sub>2</sub>S Concentrations Monitoring**

The permittee shall install, calibrate, and operate a biogas flow meter and an H<sub>2</sub>S gas monitor that shall be placed after the outlet of the anaerobic digester.

The permittee shall monitor and record the biogas flow and the H<sub>2</sub>S concentrations in weekly basis. The most recent five years' compilation of data shall be kept onsite and shall be made available to DEQ representatives upon request.

The permittee shall use the biogas flow rate and the H<sub>2</sub>S concentrations results to calculate the annual SO<sub>2</sub> emissions from the biogas flares. This information shall be maintained onsite at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

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***Reporting Requirements*****5.6 Flame-outs and Odor Complaints**

The permittee shall submit semi-annual reports to DEQ by January 15 and July 15 of each year summarizing the occurrences of flare flame-outs and odor complaints and corrective actions taken during the period.

**[PTC Condition]**

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## 6. SUMMARY OF EMISSION RATE LIMITS

The following table provides a summary of all emission rate limits required by this permit.

Table 6.1 SUMMARY OF ALL EMISSION RATE LIMITS

J.R. Simplot – Food Group, Nampa										
Emission Limits <sup>a</sup> – Hourly (lb/hr), and Annual <sup>b</sup> (T/yr)										
Source Description	PM <sub>10</sub> <sup>c</sup>		NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cleaver Brooks boiler	0.5	2.25	6.8	29.7	5.7	24.9				
Nebraska boiler	0.7	3.21	4.3	18.8	8.1	35.5				
Air make-up units			3.6	15.8						
Process equipment		70.9		8.9				55.0		
Anaerobic digestion equipment										26.9

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>c</sup> Includes condensibles.

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**7. FACILITY-WIDE EMISSIONS INVENTORY**

The following table provides a summary of the emissions inventory of the facility based on potential to emit. The emissions inventory table is provided for informational purposes only.

**Table 7.1 EMISSION INVENTORY BASED ON PTE**

<b>J.R. Simplot – Food Group – Nampa</b>					
<b>Potential Emissions<sup>a</sup> Annual (T/yr)</b>					
<b>Source Description</b>	<b>PM<sub>10</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>SO<sub>2</sub></b>
	<b>T/yr</b>	<b>T/yr</b>	<b>T/yr</b>	<b>T/yr</b>	<b>T/yr</b>
Cleaver Brooks boiler	2.25	29.7	24.9	1.63	0.18
Nebraska boiler	3.21	18.8	35.5	2.33	0.25
Air make-up units	1.20	15.8	13.2	0.9	0.09
Process equipment	70.9	8.9	7.47	55.0	0.05
Anaerobic digester flare and boiler	0.24	3.14	2.63	0.16	26.9
<b>Total</b>	<b>77.8</b>	<b>76.3</b>	<b>83.7</b>	<b>60.0</b>	<b>27.5</b>

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-030064**

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**8. GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.